

REMARKS

Applicant respectfully requests that the above-identified application be reexamined.

Claims 1-56 are pending in this application. The Office Action mailed October 30, 2007 (hereinafter "Office Action"), objected to Claim 14 because of informalities. In addition, the Office Action rejected Claims 1-6 and 30-56 under 35 U.S.C. § 103(a) as being unpatentable in view of the teachings of U.S. Patent No. 6,442,748, issued to Bowman-Amuah (hereinafter "Bowman"), taken in view of the teachings of "UniqueID Generator: A Pattern for Primary Key Generation," by Jason Westra (hereinafter "Westra"). Claims 7-11 were rejected under 35 U.S.C. § 103(a) as being unpatentable in view of Bowman, taken in view of Westra, and further in view of U.S. Patent Application Publication No. 2002/0078069, to Moore (hereinafter "Moore"). Claims 12-14, 16, 17, 20, and 28 were rejected under 35 U.S.C. § 102(b) as being anticipated by Moore. Claims 15, 18, 19, 21-27, and 29 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Moore in view of Bowman. While applicant respectfully disagrees, in order to advance the prosecution of this application, clarifying amendments have been made to some of the independent claims.

Pursuant to 37 C.F.R. § 1.111 and for the reasons set forth below, applicant respectfully requests reconsideration and allowance of the pending claims. Prior to discussing in detail why applicant believes that all the claims in this application are allowable, a brief description of the disclosed subject matter and brief descriptions of the teachings of the cited and applied references are provided. The following descriptions of the disclosed subject matter and the cited and applied references are not provided to define the scope or interpretation of any of the claims of this application. Instead, these descriptions are provided solely to assist the United States Patent and Trademark Office in recognizing the differences between the pending claims and the cited references and should not be construed as limiting on the disclosed subject matter.

Disclosed Subject Matter

Disclosed are methods implementable in a computer readable medium for creating generators that will execute a specific task. Values of generator properties for each generator specify the behavior of the generator during execution. For example, the incrementation capability adjusts the value of a generator property during consecutive executions. Additionally disclosed are classes and at least one indicator associated with the generators that schedule, log, and indicate the status related to the generators.

Summary of Bowman-Amuah ("Bowman") - U.S. Patent No. 6,442,748

Bowman is purportedly directed to a system, method, and article of manufacture for separating logic and data access concerns during development of a persistent object for insulating development of business logic from development of data access routine. A persistent object being developed is accessed and a state of the persistent object is detached into a separate state class. The state class serves as a contract between a logic development team and a data access development team. While describing separating logic and data access, Bowman fails to teach, disclose, or suggest the creation of generators for executing a specific task.

Summary of Westra - "UniqueID Generator: A Pattern for Primary Key Generation"

Westra describes generating unique IDs for persistent objects in an Enterprise JavaBeans (EJB) application. EJB is a server-side component model that targets the specific business domain of online transaction processing (OLTP) applications. The data records or objects for each transaction require unique identifiers to allow them to be stored and retrieved accurately.

Summary of Moore - U.S. Patent Application Publication No. 2002/0078069

Moore is purportedly directed to a system and a method that allows a user to implement a template to create files with different names without having to manually create and name those files. A user specifies which name, which name base, or how any portion of a file name is to be written. As the system traverses the files, a user is normally prompted to accept the name or alter

it. After the user has entered the preference on naming, the system creates or renames the file. Like Bowman, Moore is not directed to the creation of generators for executing a specific task.

Objection to Claim 14

As indicated above, the Office Action objected to Claim 14 because of informalities. Per Examiner note, Claim 14 has been corrected to amend the improper punctuation.

Rejection of Claims 1-6 and 30-56 Under 35 U.S.C. § 103(a)

As indicated above, Claims 1-6 and 30-56 were rejected under 35 U.S.C. § 103(a) as being unpatentable in view of the teachings of Bowman, taken in view of the teachings of Westra. As noted in the summaries above, Bowman and applicant's disclosed subject matter have important differences. Bowman is directed to a system that allows for the separation of logic development from data access development so that a persistent object or a persistent state of an object is insulated from change. (See, e.g., Col. 2, lines 22-33). This approach purportedly avoids corruption of data or loss of data during development by various development teams. In contrast, applicant's disclosed subject matter is directed to methods that generate an object to perform a specified task. The execution of the task by the generator is accomplished through generator properties. Thus, Bowman is directed to data preservation, whereas applicant's claimed subject matter is directed to executing a generator class to perform a specific task.

Claims 1-6

The Office Action alleges that applicant's claims read on the cited portions of Bowman. Applicant respectfully disagrees for the following reasons. First, the Office Action failed to show which parts of Bowman disclose the preamble of Claim 1 and therefore failed to provide the basis for rejection of the preamble of Claim 1. Second, the portions of Bowman cited in the Office Action in its rejection of Claim 1 have little, if any, relationship to one another, whereas elements or portions of the prior art must relate to one another as recited in the claims in order to disclose the claimed subject matter. (See M.P.E.P. § 2131.) Third, applicant respectfully submits that the remarks in the Office Action fail to comply with 37 C.F.R. § 1.104(c)(2).

because they fail to explain the pertinence of cited references. Applicant notes that 37 C.F.R. § 1.104(c)(2), under the "Rejection of Claims" heading, requires:

When a reference is complex or shows or describes inventions other than that claimed by the applicant, the particular part relied on must be designated as nearly as practicable. The pertinence of each reference, if not apparent, must be clearly explained and each rejected claim specified.

In its rejection, the Office Action references the elements of prior art that have no relation to each other and/or do not disclose the subject matter recited in Claim 1, as amended. For example, the Office Action asserts that Bowman discloses the "base generator class constructor" at Col. 285, lines 21-42. However, the referenced text contains only a computer program illustrating "the relationship between two classes using object identifiers." (See Col. 285, lines 14-15.) This relationship is used in a method illustrated in Figure 170 and described in Col. 284, lines 4-31, of Bowman. The method is described as a "method 17000 for implementing an association of business objects without retrieving the business objects from a database on which the business objects are stored." (Col. 284, lines 4-7.) Applicant fails to understand how the programmatic illustration of a method of retrieving an object given its unique identifier (Col. 285, lines 8-10) is related to the base generator class constructor recited in Claim 1. In order to further distinguish this recitation from Bowman and to clarify the purpose of the base generator class constructor, applicant has amended Claim 1 to recite "the base generator class constructor **for initializing a generator**." (Emphasis added.)

The Office Action asserts that Bowman discloses the "status indicator" recitation of Claim 1, referencing Col. 92, lines 53-55; Col. 108, lines 16-19; Col. 111, line 37; and Col. 112, lines 2, 9-10, 41-43. However, the referenced parts of Bowman describe different and unrelated elements of software that have no relation to a status indicator. Col. 92, lines 53-55, describe "Translation Monitor Services" that "are primary interface through which applications invoke Translation services and receive status and error information." Col. 108, lines 16-19, describe Push/Pull Services; Col. 111, line 37, describes a report status table, and Col. 112, lines 2, 9-10,

and 41-43, describe the report status table. None of the referenced elements have anything to do with the base generator class status indicator recited in Claim 1.

The Office Action references the same quotes in rejecting the Claim 4 recitation: "the status indicator includes a user interface (UI) for displaying the execution status of generators." Applicant has been unable to identify any connection between the cited text and the Claim 4 recitation. It appears that the Office Action is simply referencing the parts of Bowman that include the key word "status." The referenced text fails to disclose, teach, or suggest the status indicator of Claims 1 and 4. Similarly, the Office Action failed to explain the pertinence of the portions of Bowman cited in regard to the schedule class and the logging class recitations of Claim 1, or show how the reference portions relate to each other.

Because Bowman fails to disclose all of the recitations of Claim 1, as amended, Claim 1 is submitted to be allowable over Bowman taken alone or in combination with Westra. In this regard, Westra does not make up for deficiencies of Bowman. Westra is directed toward the generation of unique identifiers for the data involved in an EJB transaction processing system. Westra's intent is to "generate unique IDs for persistent objects in an EJB application." See Westra, Intent. Since the Westra subject matter has nothing to do with the base generator class for use by developers to create generators to perform specific tasks, even if Westra were combinable with Bowman, which applicant denies, the resulting combination would still fail to meet all of the recitations of Claim 1. Thus, Claim 1 is submitted to be allowable.

Since Claims 2, 3, 5, and 6 depend from Claim 1, these claims are submitted to be allowable for at least the same reasons as Claim 1. Claim 4 is submitted to be allowable for the same reasons as Claim 1 and for additional reasons discussed above.

Claims 30-52

Applicant respectfully disagrees with the Office Action that Bowman discloses or suggests the "creating a generator that performs a specific task," "customizing settings of the generator," "executing the generator with the customized settings," and "verifying the task based

on the settings of the generator" recitations of independent Claim 30. Applicant further submits that the remarks in the Office Action accompanying the rejection of Claim 30 fail to comply with 37 C.F.R. § 1.104(c)(2) because they fail to explain in detail the pertinence of Bowman to these recitations. For example, the Office Action asserts that Bowman discloses the "creating a generator that performs a specific task" in Col. 14, lines 24-26. However, the referenced text refers to the general description of the event loop programs in an application framework. Col. 14, lines 24-26 recite as follows: "Subsequently, they build from there by replacing some of the generic capabilities of the framework with the specific capabilities of the intended application." The cited text clearly has no relation to a generator that performs a specific task. Similarly, Col. 272, line 66-Col. 273, line 6, referenced by the Office Action in relation to the "customizing settings of the generator" recitation of Claim 30, generally describe the persistence capability of persistent data stores. This function has nothing to do with "customizing settings of the generator."

Col. 186, lines 8-20, referenced by the Office Action in relation to the "verifying the task based on the settings of the generator" recitation of Claim 30, provides a general description of a leverage point processing. This description does not have anything to do with "verifying the task based on the settings of the generator."

In summary, applicant has been unable to determine how, if at all, the text of Bowman cited in the Office Action relates to the recitations of Claim 30. Applicant submits that the parts of Bowman referenced in the Office Action fail to teach, disclose, or suggest the above recitations of Claim 30. Because Westra does not make up for deficiencies of Bowman, Claim 30 is submitted to be allowable over Bowman in view of Westra. Claims 31-52 depend directly or indirectly from Claim 30 and are submitted to be allowable for at least the same reasons as Claim 30.

Claims 53-56

Applicant respectfully submits that independent Claim 53, as amended, is allowable over Bowman in view of Westra. Applicant further submits that the remarks in the Office Action accompanying the rejection of independent Claim 53 fail to comply with 37 C.F.R. § 1.104(c)(2) because they fail to explain the pertinence of cited references. In this regard, applicant submits that Col. 154, lines 58-60; Col. 253, lines 63-67; Col. 258, lines 31-27; Col. 279, line 65-Col. 280, line 2; and Col 299, lines 32-35, referenced in the Office Action in relation to the "allowing the value of the property to vary during consecutive executions of the task" recitation of Claim 30, describe various software elements (e.g., integrated performance support, view configurer, assertion exception, etc.) that are wholly unrelated to each other or to the above recitation. Applicant has been unable to determine how, if at all, these references relate to the recitations of Claim 53. To further distinguish Claim 53 from Bowman, Claim 53 has been amended to recite "**consecutive executions of the task performed by a generator created to perform the task.**" (Emphasis added.)

Because Bowman fails to teach all of the recitations of Claim 53, and because Westra does not make up for deficiencies of Bowman, Claim 53, as amended, is submitted to be allowable over Bowman in view of Westra. Because Claim 55 contains subject matter similar to that of Claim 53, and because Claim 55 has been amended in the same manner as Claim 53, Claim 55 is submitted to be allowable over Bowman in view of Westra for at least the same reasons as Claim 53. Because Claim 54 depends from Claim 53, and Claim 56 depends from Claim 55, Claims 54 and 56 are submitted to be allowable for at least the same reasons as Claims 53 and 55, respectively.

Rejection of Claims 7-11 Under 35 U.S.C. § 103(a)

As indicated above, Claims 7-11 were rejected under 35 U.S.C. § 103(a) as being unpatentable in view of Bowman, taken in view of Westra, and further in view of Moore. Applicant respectfully disagrees that independent Claim 7 is unpatentable in view of Bowman,

taken in view of Westra, and further in view of Moore. Initially, applicant respectfully submits that the Office Action failed to provide any basis and rationale for this combination teaching, or suggesting the preamble of Claim 7, namely "A method of creating a generator, wherein the generator performs a specific task including at least creating a file."

Applicant further submits that Bowman fails to teach, disclose, or suggest the "verifying the task based on properties of the generator" recitation of Claim 7. Col. 14, lines 24-26, referenced by the Office Action with respect to this recitation, refer to the general description of the event loop programs in an application framework. Col. 14, lines 24-26, recite as follows: "Subsequently, they build from there by replacing some of the generic capabilities of the framework with the specific capabilities of the intended application." The cited text clearly has no relation to "verifying the task based on properties of the generator."

Because Bowman fails to teach, disclose, or suggest all of the recitations of Claim 7, and because Westra and Moore do not make up for deficiencies of Bowman, Claim 7 is submitted to be allowable over Bowman in view of Westra and further in view of Moore. Because Claims 8-11 depend directly or indirectly from Claim 7, and because Claim 7 is submitted to be allowable, Claims 8-11 are submitted to be allowable over Bowman in view of Westra and further in view of Moore for at least the same reasons as Claim 7 is allowable.

Rejection of Claims 12-14, 16, 17, 20, and 28 Under 35 U.S.C. § 102(b)

As indicated above, Claims 12-14, 16, 17, 20, and 28 were rejected under 35 U.S.C. § 102(b) as being anticipated by Moore. Applicant respectfully disagrees that independent Claim 12 is anticipated by Moore. Specifically, applicant disagrees with the Office Action that paragraph [0008] of Moore anticipates the preamble of Claim 12, namely, "A method of creating a generator, wherein the generator performs a specific task including at least creating a file." As noted in the Summary of Moore section of this Amendment, Moore is directed toward a method of generating file names, not creating files. Paragraph [0008] of Moore describes a "mechanism for automatically generating file **names** and otherwise manipulating file attributes for documents

produced from predefined templates." (Emphasis added.) While describing a mechanism for generating file names, Moore fails to disclose a "method of creating a generator" and "specific task including at least creating a file" as recited in the preamble of Claim 7.¹ The Office Action also references paragraph [0008] in its rejection of the "customizing settings of the generator" recitation of Claim 12. It is clear from the above quote that paragraph [0008] does not disclose or suggest this recitation.

Applicant further submits that contrary to the Office Action assertion, paragraph [0012] of Moore fails to teach or suggest "the settings including incrementation settings that specify how the value of a generator property may vary between generated objects" recitation of Claim 12. In this regard, paragraph [0012] of Moore reads as follows:

A file naming attribute is associated with a document template, document control object, or similar document-defining structure which includes at least one text string for a constant or fixed portion of file names for documents created utilizing the document-defining structure and at least one argument for computing a variable portion of the file names. The argument may require calculation of a time and/or date or of an incremental number, or require that the user be prompted for input. When a new document is created utilizing the document-defining structure, the file naming attribute is employed to automatically generate a file name for a discrete file into which the new document may be saved by concatenating text string(s) for the fixed portion(s) and the calculated or received text string(s) for the variable portions(s) [sic].

It is clear from the foregoing text that the mechanism described in paragraph [0012] does not generate objects, such as files. Instead, this mechanism only generates file names for the files created by a user. Indeed, element 302 in Figure 3 of Moore includes the description: "User creates document using template/DCO." In the end of the process illustrated by Figure 3, element 314 provides for the generation of a file name for the document created by a user. In contrast, the generator of Claim 12 generates objects, including files and their properties, such as file names. To better emphasize this distinction, Claim 12 has been amended to recite "the

¹ While applicant recognizes that in some instances the preamble language of a claim can be ignored, such is not the case where a preamble gives life, meaning, and vitality to a claim, such as here. See M.P.E.P. § 2111.02.

settings including incrementation settings that specify how the value of a generator property may vary between generated objects, **the generated object including a file.**" (Emphasis added.)

Because Moore fails to teach or suggest the subject matter recited in the preamble of Claim 12 (a "method of creating a generator" discussed above), Moore also fails to teach or suggest the "executing the generator with the customized settings" recitation of Claim 12. Paragraph [0012], referenced by the Office Action in regard to this recitation and quoted above, clearly does not disclose "executing the generator with customized settings." Instead, this paragraph describes generating a file name for a document created by a user.

Because Moore fails to disclose, teach, or suggest all of the recitations of Claim 12, as amended, applicant submits that Claim 12 is allowable over Moore. Because Claims 13, 14, 16, 17, 20, and 28 depend directly and indirectly from Claim 12, these claims are submitted to be allowable for at least the same reasons that Claim 12 is submitted to be allowable.

Claim 16 is submitted to be allowable for at least one additional reason. Contrary to the Office Action assertion, Moore fails to disclose or suggest loading the settings of a generator from a file. Paragraph [0046], referenced by the Office Action in regard to Claim 16, only discusses a process for saving a document created utilizing a document control object. This process includes creating backups for a document and setting a timer, as shown in Figure 4B. Nowhere in paragraph [0046] or elsewhere does Moore disclose loading the settings of a generator from a file.

Rejection of Claims 15, 18, 19, 21-27, and 29 Under 35 U.S.C. § 103(a)

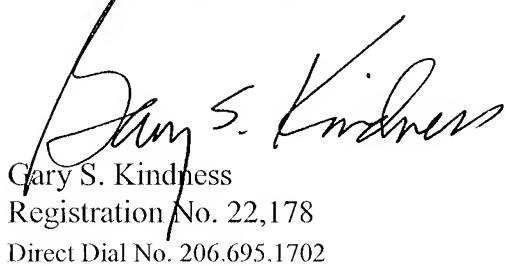
As indicated above, Claims 15, 18, 19, 21-27, and 29 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Moore in view of Bowman. Because Claim 12 is submitted to be allowable, and because Claims 15, 18, 19, 21-27, and 29 depend directly or indirectly from Claim 12, these claims are submitted to be allowable for the same reasons as Claim 12. In this regard, Bowman does not make up for deficiencies of Moore as discussed above in regard to Claim 12.

CONCLUSION

In view of the foregoing amendments and remarks, applicant respectfully submits that all of the remaining claims in this application are allowable. Consequently, early and favorable action passing this application to issue is respectfully requested. If the Examiner has any remaining questions, the Examiner is encouraged to contact applicant's attorney at the number set forth below.

Respectfully submitted,

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